



**Los Angeles City Ethics Commission**

August 30, 2013

The Honorable City Council  
c/o Holly Wolcott, Interim City Clerk  
200 North Spring Street  
City Hall – 3rd Floor  
Los Angeles CA 90012

**Re: Council File Number 13-1056  
Appointment of Delia Ibarra to the  
Fire Commission**

***FOR COUNCIL CONSIDERATION***

Dear Councilmembers:

On August 14, 2013, the Mayor transmitted to the City Clerk a letter indicating his appointment of Ms. Delia Ibarra to the Fire Commission. The Ethics Commission received Ms. Ibarra's pre-confirmation statement of economic interests (SEI) today, and this letter is provided for your consideration as part of the confirmation process. A copy of this letter is also being provided to Ms. Ibarra to help her avoid potential conflicts of interests that may arise in the course of her tenure as a member of the Fire Commission.

Ms. Ibarra reports on her SEI an ownership interest in and income from Lara & Ibarra, where she is a partner. She also reports an ownership interest in real property located in the City of Los Angeles. Finally, Ms. Ibarra reports income from clients to Lara & Ibarra of \$10,000 or more, and gifts from several different sources, which are listed on the attachments. If a matter involving any of these interests comes before the Fire Commission, Ms. Ibarra should, before acting, seek the advice of the City Attorney regarding whether she should disqualify herself. We are unable to assess if or how frequently Ms. Ibarra would be in a position of having to recuse herself.

Interests disclosed on an SEI are not the only interests that can give rise to a conflict of interests. For example, state law may require recusal by a board or commission member due to certain business activities of the clients of that member's employer. Additionally, recusal may be required under City Charter § 222, which states that the City Attorney may provide a written opinion concerning the obligation of a City official to refrain from acting on a matter when it may violate state law or when action may not be in the public interest.

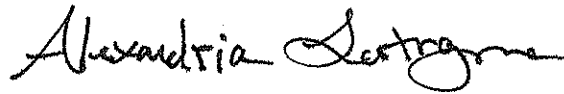
If a matter raises a potential conflict of interests, we encourage Ms. Ibarra to seek the advice of the City Attorney before acting. If Ms. Ibarra is required to disqualify herself from acting on a matter, Los Angeles Municipal Code § 49.5.6(J) and Executive Directive 2005-1 require her to file a Recusal Notification Form (CEC Form 51) with the Ethics Commission and the Mayor's office. If a board or commission member is disqualified from acting on three or more agenda items in a year because of a conflict caused by the same interest, the Ethics Commission is required by City Charter § 707 to review the conflict. If the Ethics Commission

determines that the member has a significant and continuing conflict of interests, it must order divestment of the interest that is causing the conflict.

In addition to reviewing a nominee's SEI, the Ethics Commission also verifies that the nominee is a registered City voter. We have received a completed Residence Verification Form for Ms. Ibarra, which affirms that she is registered to vote in the City.

If you have questions, please feel free to contact Ethics Program Manager Shannon Prior at (213) 978-1960.

Sincerely,

A handwritten signature in black ink that reads "Alexandria Latragna". The signature is written in a cursive, flowing style.

Alexandria Latragna  
Ethics Program Analyst

Attachments

cc: Mayor Eric Garcetti  
Ms. Delia Ibarra

**Attachment A**

**Delia Ibarra**

*Pre-confirmation Form 700*

*August 2013*

**Schedule A-2**

**Sources of Income to Lara & Ibarra of \$10,000 or more**

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New Capital LLC

New Economics for Women

Delia Hauser, as an individual

Rumba Room, LLC

Briandria Holdings, LLC

Plaza de la Raza Child Development Services, Inc.

Sergio Sanchez, as an individual

Tortilleria La California

Sergio's Tacos

Skid Row Development Corporation

Juan H. Lara, an individual

Senator Richard Polanco, Sr. (Retired), an individual (through Tres Es, Inc.)

Gabrielino Tongva Tribe

**Attachment B**

**Delia Ibarra**

*Pre-confirmation Form 700*

*August 2013*

**Schedule D  
Gifts**

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| <b>Source</b>   | <b>Gift</b>   |
|---|---|
| Professor Laura Gomez, Esq<br>(UCLA Law School)         | \$250 MALDEF annual dinner<br>\$75 UCLA Law dinner                    |
| Senator Richard Polanco<br>(Retired)—Tres Es Consulting | \$60 Dodger Ticket  |
| Sandra Sepulveda, Esq<br>(O'Melveny & Myers)            | \$250 Mexican American Bar Fund Dinner<br>\$125 Latina Lawyers Dinner |